

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

RECEIVED
2022 JAN 31 PM 3:22
CLERK OF COURT
U.S. DISTRICT COURT
DISTRICT OF PUERTO RICO

-----X
In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.,

Debtors.
-----X

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth.

Motion in Opposition to Motion (Document no. 18961) and Requesting Remedy

To the Honorable Court:

NOW COMES, Francisco E. Álvarez Rosario and Gloria E. Rodríguez de Álvarez (a/k/a Gloria Rodríguez Rodríguez) pro se and respectfully allege and pray:

1. We filed Proof of Claims (POF) #179571 and 179569 regarding a claim under Law 7 of March 9, 2009. Said claims of \$5,000 per capita plus interest therein are statutory claims which must be 100% paid in the usual course of business.
2. The Commonwealth has filed an Omnibus Objection (Document no. 18961) which includes POF #179571 and #179569 based on late filing.
3. Claims under Law 7 of March 9, 2009 have not been included nor assigned a class in Modified Eighth Amended Title III Joint Plan of Adjustment Of The Commonwealth Of Puerto Rico, *Et Al.* (Case:17-03283-LTS Doc#:19784 Filed:01/14/22) filed on Friday January 14, 2022, therefore they are non-dischargeable under PROMESA and Bankruptcy Law. Further, claims regarding statutory claims under Law 7 of March 9, 2009, technically need not be filed at all as they should be 100% paid as claims made in the ordinary course of business. Therefore; the bar date is irrelevant as regards claims omitted from PROMESA's filing in this case.
4. The proper remedy for this Court is to deny Omnibus Objection 18961 as to POF #179571 and 179569 and to order that these claims of \$5,000 per capita plus interest therein be referred to the Treasury Department of the Commonwealth of Puerto Rico for administrative reconciliation and eventual 100% payment.

5. Therefore, being our claims of \$5,000 per capita plus interest therein valid and not deficient, this Honorable Court should deny the objection and rule the claims to be valid under applicable bankruptcy law with such further relief as the Court deems necessary.
6. The undersigned requests to be notified by mail and email as to any order entered regarding the matters addressed in this motion as the undersigned are not registered users of this case filing system.
7. We feel confident that the filing of the objection as to our Proof of Claims by the debtor Commonwealth has been an inadvertent error in this voluminous case and that after further examination, they will on their own initiative withdraw their objection on our claims of \$5,000 per capital plus interest thereby saving time and expense to The Financial Oversight and Management Board for Puerto Rico; the Commonwealth; this Honorable Court; and us.

NOW WHEREFORE it is respectfully requested from this Honorable Court to deny Omnibus Objection 18961 as to POF #179571 and 179569 and to order that these claims be referred to the Treasury Department of the Commonwealth of Puerto Rico for administrative reconciliation and eventual 100% payment.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that copy of this motion has been sent to Counsel for the Oversight Board Proskauer Rose LLP attn. Martin J. Bienestock and Brian S. Rosen and to Counsel for the Creditors Committee Paul Hastings LLP attn. Luc A. Despins, James Bliss, James Worthington and G, Alexander Bongartz to their addresses of record.

Respectfully submitted in San Juan, Puerto Rico, this 26th day of January, 2022.

Francisco E. Álvarez Rosario

Gloria E. Rodríguez de Álvarez (a/k/a Gloria Rodriguez Rodriguez)

Pro Se

Calle Nueva F 17

Urb. Villa Clementina

Guaynabo, PR 00969-5012

fearosario@gmail.com

Tel. 787-789-9627